

U.S. DISTRICT COURT
UNITED STATES DISTRICT COURT DISTRICT OF N.H.
DISTRICT OF NEW HAMPSHIRE FILED

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**ADDENDUM TO GOVERNMENT'S OBJECTION TO DEFENDANT'S
RENEWED MOTION FOR BAIL PENDING TRIAL**

On November 3, 2014, the Court held a hearing on the defendant's renewed motion for bail pending trial. During that hearing, the government proffered that the defendant had, among other things, made an explicit threat during a recorded prison call to harm a potential trial witness. The Court ordered the government to provide, to the defendant and to the Court, a copy of that call and a transcript of the relevant clip, within 7 days.

Pursuant to that order, the government hereby submits, as an addendum to its objection to the defendant's renewed motion for bail, a CD labeled "Government Exhibit 1," which contains: (1) The full recorded prison call from December 18, 2013 (15:03pm); (2) a clip of that recorded call, containing the relevant statements of the defendant; and (3) a transcript of the clip. A copy of these materials has been overnighted to the defendant's counsel, and should arrive no later than Thursday, November 6, 2014.

In light of this threat, and for the many other reasons identified in its objection, the United States maintains its position that the defendant should continue to be detained pending his December trial.

Respectfully submitted,

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Date: November 5, 2014

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via ECF to Lawrence Vogelman, Esq., counsel for defendant.

/s/ Nick Abramson

Nick Abramson

Assistant United States Attorney